

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Westside Lead - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #7  
Progress  
Westside Lead  
C482  
ATLANTA, GA  
Latitude: 33.7654320 Longitude: -84.4087470

**To:** James Webster, USEPA R4 ERRPB

**From:** Chuck Berry, OSC

**Date:** 5/18/2020

**Reporting Period:** May 3, 2020 - May 17, 2020

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C482	<b>Contract Number:</b>	
<b>D.O. Number:</b>	68HE0420F0006	<b>Action Memo Date:</b>	5/6/2020
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/6/2020	<b>Start Date:</b>	1/6/2020
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	GAN000407160	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	GA EPD
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Other - Historical use of contaminated fill prior to implementation of the Resource Conservation and Recovery Act (RCRA).

#### 1.1.2 Site Description

##### 1.1.2.1 Location

The Westside Lead Site is located in the English Avenue and Vine City neighborhoods of Atlanta, just west of downtown. In January, 2020, the site boundaries were expanded. The new site is bounded by the former CSX rail line and Northside Drive to the east, North Avenue to the north, Oliver Street and Sciple Terrace to the west, and Foundry Street to the south. The address used is 395 Elm Street, Atlanta, Fulton County, Georgia 30314. The Site coordinates are Latitude: 33.7654320, Longitude: -84.4087470.

The Site is primarily residential with commercial and institutional property interspersed throughout, but particularly along the eastern border abutting the former rail line. Additionally, several large City parks are included in the new boundary. Based on a parcel-by-parcel survey, there are 1068 residential properties within the entirety of the boundary, both Phase 1 and 2. Most are single-family homes, although there are several multi-family properties within the area. Nearly all of the owners are absentee landlords renting out the property. Additionally, the area Avenue has a high percentage of unimproved or abandoned property. The 2008 housing crisis left many properties distressed, and many properties remain abandoned.

##### 1.1.2.2 Description of Threat

Refer to Initial POLREP for this information.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Refer to Initial POLREP for this information.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Previous Response Actions

Residential soil excavation began on January 27, 2020. For a detailed accounting of previous activity during this response, please see the prior Pollution Reports.

#### 2.1.2 Response Actions This Reporting Period

Site crews have taken steps to reduce their potential exposure to the SARS-COV2 coronavirus, including taking worker body temperatures during the morning safety briefing, maintaining social distancing between workers when possible, reducing or eliminating their interaction with the general public, and increasing the cleaning of common areas.

Region 4 has promulgated new COVID-19 guidelines for resuming response actions at residential sites. New protocols are in effect for engaging with the public, including wearing masks, maintaining social distance, and eliminating face-to-face interactions whenever possible. Both sampling and clean-up of occupied properties will resume using these new protocols. Cleanup of Tier 1 and Tier 2 properties are expected to resume within 30 days, once the backlog of unimproved and unoccupied properties are finished. Additionally, a new office location will be set up on an empty lot on Meldrum Street. The parcel will be excavated to remove contamination. Two office trailers here will host EPA and START personnel, and provide a community involvement center once COVID-19 restrictions are relaxed or new protocols enacted.

On May 6, 2020, a ceiling increase action memorandum was signed by the SEMS Division Director, increasing the project ceiling to \$5.9M.

Atlanta Gas Light (AGL) began an initiative in the neighborhood to disconnect supply lines on empty lots. This requires excavating the right-of-way of several dozen lots within the current site boundary. The AGL project was discovered after AGL began digging at 395 Elm Street, excavating several cubic yards of slag from the lot. XRF analysis of the material revealed the slag was elevated in lead (>1,000 ppm). The contaminated material was incorporated into the site waste stream. 395 Elm is a parcel with known lead concentrations above the site-specific remediation goal and is on the list of properties requiring excavation. AGL was unaware of EPA's removal action at the Westside Lead site. In discussion with AGL project managers this week, EPA agreed to work with AGL on a unified plan to address the contaminated soil AGL unearthed. A general workplan will be submitted within the next couple of weeks for EPA's review.

### 2.1.2 Outreach and Community Involvement

Due to COVID-19, face-to-face interaction with the public has been suspended. However, communication via telephone, email and internet continues. ERRPPB is currently exploring alternative methods of engaging with the public while maintaining social distancing. A new mapping tool was added to the project web site to allow citizens to determine if their property is within the study area. the tool is located at <https://cumulis.epa.gov/supercpad/CurSites/csinfo.cfm?id=0407160>.

### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Enforcement activities continue. If a PRP is identified, appropriate action will be taken.

### 2.1.4 Progress Metrics

Metrics are current as of the end of the reporting period.

SAMPLING	
Total Properties (estimated):	1068
Access Granted:	344
Properties Sampled:	285
Properties Requiring Removal (>400ppm):	140
REMOVALS	
Properties Requiring Removal:	140
Properties in Progress:	3
Properties Completed:	20
Properties Remaining:	120
DISPOSAL	
Tons of non-hazardous soil:	5,132

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

During the weeks of May 18-31, ERRS will continue to excavate the remaining unimproved / vacant properties began under the COVID-19 restrictions. Work will also begin on a new office location for START, EPA, and community involvement. Once the parcels scheduled under the COVID restrictions are completed, work on occupied lots, specifically Tier 1 and 2 parcels, will continue. Once those are exhausted, work on Tier 3 lots will begin.

#### 2.2.1.2 Next Steps

The Region 4 Superfund Remedial and Site Evaluation Branch has initiated a Preliminary Assessment for the Westside Lead Site. All sampling and outreach efforts to support sampling will be transferred to RSEB by the end of May.

### 2.2.2 Issues

Worker health and safety due to the coronavirus outbreak is of utmost concern.

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

#### 2.4.1 Narrative

An Action Memorandum finding increase was signed on May 6, 2020, bringing the total site allocation, including contingency funds, to \$5,940,000. The Action Memorandum also exempted the site from the 12-month and \$2,000,000 statutory limits.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$4,100,000.00	\$1,500,000.00	\$2,600,000.00	63.41%
TAT/START	\$1,300,000.00	\$110,000.00	\$1,190,000.00	91.54%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$5,400,000.00</b>	<b>\$1,610,000.00</b>	<b>\$3,790,000.00</b>	<b>70.19%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

### 2.5 Other Command Staff

No information available at this time.

### 3. Participating Entities

No information available at this time.

### 4. Personnel On Site

#### STAFFING THIS REPORTING PERIOD

OSCs: 1

CICs: 1

START: 1

ERRS: 14

### 5. Definition of Terms

No information available at this time.

### 6. Additional sources of information

No information available at this time.

### 7. Situational Reference Materials

No information available at this time.